



U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

April 30, 1987

RECEIVED
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REPLY TO
ATTN OF:

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WASTE MANAGEMENT BRANCH

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. George Drexler
c/o Ramcor Industries
1920 C Street S.
Tacoma, Washington 98402

and 4610 N. 30th St.
Tacoma, Washington 98407

Mr. W. Alan Pickett
E. 803 Mission
Spokane, Washington 99202

and Box 125
Otis Orchard, Washington 99027

Re: Arrcom/Rathdrum site; Rathdrum, Idaho.

Dear Mr. Drexler and Mr. Pickett:

The Environmental Protection Agency ("EPA") has learned that you recently purchased personal property at the former Arrcom used oil and hazardous waste processing site near Rathdrum, Idaho. As you know, this site is listed on the Superfund National Priorities list due to excessive contamination of the equipment and surrounding soils with hazardous substances. Additionally, the facility is a RCRA regulated treatment, storage and disposal site, subject to all applicable regulations found at 40 CFR Parts 260 through 270. As a result, any activities which you plan at the site, including any removal of property from the site or use of the property, must be done in accordance with the statutes and regulations associated with applicable laws, and must not interfere with the Superfund cleanup activities at the site. Specifically, property at the site cannot be used or taken from the site without explicit permission from EPA to do so.

For your information, EPA plans a Superfund cleanup and removal action at the site within the next few weeks. That cleanup will involve the decontamination of the tanks at the site, including the destruction of some heavily contaminated tanks and equipment; and possible decontamination of the trucks at the site, as well as other cleanup and investigation activities. I repeat, the tanks and the trucks located on site should not be moved or disturbed in any manner prior to that cleanup. Because the removal activities are limited in scope and because of EPA's failure to obtain cooperation from

USEPA RCRA



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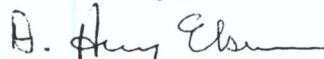
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you or other responsible parties in the past in conducting cleanup activities at the site, EPA will not invoke the special negotiation procedures of section 122 of CERCLA, 42 U.S.C. § 9622, or offer responsible parties the opportunity to perform these removal activities.

I include one final reminder to you. In an administrative proceeding concluded in 1986, the Arrcom/Rathdrum site was found to be a RCRA regulated site subject to the various regulations covering a treatment, storage and disposal facility under RCRA, 42 U.S.C. § 6901 et seq. That same proceeding found that a \$4,500 penalty for violation of these regulations was due from George Drexler, Thomas Drexler, W.A. Pickett, and various corporations jointly and severally. That penalty has not been paid. In addition, the closure plan for the facility, which is required from the owners and operators of that site pursuant to 40 CFR Part 265, Subpart G, is due. Submittal of the closure plan and closure activities should be implemented at the site immediately. Of course, use of the tanks or other equipment at the facility prior to closure plan implementation is forbidden by law. Your failure to pay the penalty and submit the closure plan is a violation of federal law and the Administrative Law Judge's order, and should be addressed by you with all due speed.

If you have further questions or comments on this matter, please contact me at (206) 442-1191.

Sincerely,



D. Henry Elsen
Assistant Regional Counsel

cc: Warren Bingham
Stephen Navaretta, Attorney
Thomas Drexler
Jeff Ring, Assistant United States Attorney
District of Idaho
Ned Bergman, U.S. Parole Office

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